

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**UNITED STATES,
Plaintiff,**

**Case No. 2:21-mj-00390
Judge Vascura**

v

**JUSTIN A. HOWARD,
Defendant.**

**DEFENDANT’S ANTICIPATORY MOTION FOR FURLOUGH
TO ATTEND THE BIRTH OF HIS DAUGHTER**

Defendant, Justin A. Howard, the Court issue an order granting him a furlough from pretrial detention to attend the birth of his daughter, for the reasons set forth in the accompanying memorandum.

s/ Keith A. Yeazel

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Attorney for Defendant

MEMORANDUM

Defendant is presently detained in the Franklin County Jail pending indictment.

Mr. Howard’s wife, Lily, is expecting the birth of their daughter on January 15, 2022. This is the first birth for both Mr. Howard and his wife. Mrs. Howard

suffers from an irritable uterus. The term irritable uterus relates to uterine contractions that do not produce any changes to the cervix. These contractions can be extremely painful. Mrs. Howard is concerned that the baby might be born prior to her due date. Her concern is why this motion is anticipatory. As such we would like to have a hopefully order in place so Mr. Howard can be present at the birth.

Counsel spoke with Assistant United Attorney Lafferty about this issue a few weeks ago. Ms. Lafferty indicated she would defer to the Court's resolution of this matter.

Wherefore, Defendant respectfully requests that the Court issue an order granting him a furlough to attend the birth of his daughter.

Respectfully submitted,

s/ Keith A. Yeazel

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CERTIFICATE OF SERVICE

A copy of the foregoing was served upon:

Sheila Lafferty, AUSA

using the Court's CM/ECF system this 13th day of December, 2021.

s/ Keith A. Yeazel

Keith A. Yeazel